

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
National Radio Systems)	MM Docket No. 99-325
Committee's "In Band On Channel)	
Digital Radio Broadcasting Standard)	
NRSC-5")	

Comments of the International Association of Audio Information Services

I. INTRODUCTION

The International Association of Audio Information Services (IAAIS) thanks the Commission for this opportunity to comment on the proposed new standards for digital radio broadcasting contained in NRSC-5. IAAIS is an association of small, community broadcast services which have as their mission the provision of current print materials such as daily newspapers in audio format for people who are blind, visually impaired or legally blind or who have a physical or cognitive disability which prevents them from holding, turning, or understanding the printed page. The association generally refers to this audience as print-disabled.

Most reading services are carried on the subcarriers of public radio stations and are operated by community-based not-for-profit organizations. A few commercial stations collaborate with a reading service to offer the community a reading service on the commercial subcarrier; such as the case with Clear Channel radio (KTTI-FM) in Yuma, AZ. In every case, there is no competing radio reading service thus making the reading service a sole-source of information access to the local community's population of print-disabled persons.

The number of people in need of this service in the United States alone is staggering. With the increasing age of the US population, and with age-related eye diseases such as macular degeneration and diabetes increasing with that population, the National Eye Institute of the US Institutes of Health estimates that 2.7% of Americans 40 years of age or older are unable to use print because of blindness or severe visual impairment. Worst case among those adults is the situation for people who are over 80. The vision loss rate for that population is 23.7%.¹ These numbers will only increase

through the year 2025 when the baby-boomer generation will have reached retirement age. Clearly the need for a system to keep these citizens informed, educated, and engaged in community life is vital to the Nation's well being and to the individuals' need to remain as independent as possible.

The transition of reading services from analog to digital – if done right - will help lessen the impact of vision loss for print-disabled persons. IAAIS members see the digital future with receivers that are accessible to persons with disabilities and therefore inclusive, with no more need for special equipment. People who need a reading service will be able to buy any HD Radio™ radio and have it able to provide them with a reading service much like a subscription-service, or provisioned for additional data channels on-demand.

II. IAAIS Generally supports the NRSC-5 Standard

IAAIS urges the Commission to make permanent authorization of HD Radio™ as proposed by iBiquity Digital Corporation. In addition, IAAIS supports multicasting for FM IBOC services. With multicasting, FM stations can elect to provide multiple program feeds to serve a more diverse radio community with specific, culturally sensitive material and information.

IAAIS also urges the Commission to authorize the use of the FM extended hybrid mode within the proposed HD Radio™ system. This will make possible the establishment of space for reading services for the blind as well as other targeted programming on existing FM services without forcing a competition for space in the main program service (MPS). It will also enable the Commission to require that minimal space be made available for new reading services for the blind on public or commercial stations. This creation of a "home" for radio reading services within the new digital service will ensure that for as long as the hybrid phase exists, the small, not-for-profit services for blind and visually impaired Americans will be able to concentrate on delivering high-quality programming and not on survival. IAAIS suggests that the Commission consider 25 kb/s (or two partitions in extended hybrid mode) for this purpose.

We further urge the Commission to take this opportunity to update the provisions of Report and Order in BC Docket No. 82-1 and other relevant past rulings to reflect the new reality of digital transmissions. Reading services for the blind must not bare undo burden for being included in the digital transition. Licensed stations which choose to upgrade to digital do not have significant costs associated with combining a reading service in the digital stream. The provisions of 82-1 and other relevant reading service protections should be applied to the new IBOC system to protect these community

services from being forced out by commercial interests, income-generating opportunities, or simply misinformed station operators.

Since all broadcasters serve the public interest IAAIS feels that, relative to reading services and other special-community services, with the new ability to multicast commercial stations should operate in the digital world with the same commitment to community as public stations. Accordingly, IAAIS proposes that any FM operator that makes available digital spectrum to a reading service for the blind or other 501(c)(3) community service shall be eligible for the following incentives:

- (1) A reduction in the Annual Regulatory Fee -- adjusted according to the bandwidth donated;
- (2) A positive point at license renewal; and
- (3) A positive point during a comparative hearing in the case of mutually exclusive applications for spectrum.

III. Conclusion

IAAIS is grateful to the Commission for its support of reading services for people with print-disabling conditions to date. The members of IAAIS look forward to the day when the listeners who rely on them hear clear, crisp signals without multi-path and crosstalk and when the reading service itself can devote more energy to providing high quality service and less to finding funding for expensive SCA receivers.

Respectfully Submitted by:

/s/

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¹ See http://www.nei.nih.gov/eyedata/pbd_tables.asp